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23 NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,)	CASE NO. 3:24-cr-00141-VC
Plaintiff,)	[PROPOSED] ORDER DENYING
v.)	DEFENDANT'S MOTION TO MODIFY
LINWEI DING,)	PROTECTIVE ORDER
Defendant.)	The Honorable Vince Chhabria
)	Courtroom 4, 17th Floor
)	Hearing: 1:00 pm on March 19, 2025

1 [PROPOSED] ORDER

2 FOR GOOD CAUSE SHOWN, it is hereby ORDERED that:

3 1. Defendant Linwei Ding's motion (Dkt. 53) to modify the Stipulated Interim Protective
4 Order (Dkt. 13) is denied.

5 2. Paragraph 3 of the Stipulated Interim Protective Order (Dkt. 13) is amended to permit
6 Defendant Linwei Ding to review Confidential Material in the U.S. offices of THE DEFENDANT'S
7 counsel on a non-networked, secure, review-only laptop maintained by THE DEFENDANT'S counsel,
8 without the presence of or supervision by THE DEFENDANT's counsel or their staff; *provided,*
9 *however,* that the laptop shall have all USB ports disabled to prevent downloads to external devices,
10 storage, or cloud platforms and THE DEFENDANT'S counsel shall collect all electronic devices and
11 means to take notes from THE DEFENDANT before his review of Confidential Material and return
12 such devices and means to THE DEFENDANT after his review. THE DEFENDANT may insert notes
13 on the laptop, which shall be accessible only to THE DEFENDANT'S counsel by means of a secure
14 transfer process facilitated by THE DEFENDANT'S counsel.

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16 Dated: _____, 2025

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18 HON. VINCE CHHABRIA
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